

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In re* Flint Water Cases.

Judith E. Levy  
United States District Judge

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This Document Relates To:

*Carthan, et al. v. Snyder et al.*  
Case No. 16-10444

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**JOINT STIPULATION REGARDING SCHEDULING ORDER  
FOR CLASS ACTION TRIAL**

Defendants, Veolia Water North America Operating Services, LLC, Veolia North America, Inc., and Veolia North America, LLC (the “VNA Defendants”), Leo A. Daly Company; Lockwood Andrews & Newnam, P.C.; and Lockwood Andrews & Newnam, Inc. (the “LAN Defendants”) and Class Action Plaintiffs hereby stipulate and agree to extend certain pre-trial deadlines in the Amended Scheduling Order for the Class Action Trial (ECF No. 2195) as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Plaintiffs’ Expert Depositions (shall be limited only to those experts for whom the parties submit new or additional reports)	November 1, 2022 – November 29, 2022	November 1, 2022 – December 30, 2022

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Defendants' Expert Reports + Complete Disclosures	January 4, 2023	February 3, 2023
Plaintiffs' Reply Expert Reports	January 18, 2023	February 17, 2023
Defendants' Reply Expert Reports	February 2, 2023	March 3, 2023
Defendants' Expert Depositions (shall be limited only to those experts for whom the parties submit new or additional reports)	February 17, 2023- March 13, 2023	March 17, 2023- April 14, 2023
Reply Expert Report Depositions	March 13, 2023 – March 20, 2023	April 14, 2023- April 21, 2023
Daubert and Summary Judgment Motions – Opening Briefs	April 4, 2023	June 12, 2023
Daubert and Summary Judgment – Response Briefs	May 9, 2023	July 17, 2023
Daubert and Summary Judgment – Reply Briefs	May 23, 2023	July 31, 2023
Deadline for parties to submit joint proposed jury questionnaire to the Court and hearing	TBD	TBD
Deadline for Parties to send 250 copies of Juror Questionnaires to Judge Levy's Chambers in Ann Arbor, Michigan	TBD	TBD
Jurors Summoned in Court to Answer Questionnaires	TBD	TBD
Hearing Regarding Excusals Based on Jury Questionnaire Responses	TBD	TBD

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Motions in Limine – Opening Briefs	August 14, 2023	August 14, 2023
Plaintiffs to Submit to Defendants Draft Joint Pretrial Order (includes witness list and exhibit list)	August 18, 2023	August 18, 2023
Motions in Limine – Response Briefs	August 28, 2023	August 28, 2023
Defendants to Submit to Plaintiffs Draft Joint Pretrial Order (includes witness list and exhibit list) and engage in meet and confer	September 1, 2023	September 1, 2023
Motions in Limine – Reply Briefs	September 6, 2023	September 6, 2023
Oral Argument on Daubert Motions	TBD	TBD
Oral Argument on Summary Judgment Motions	TBD	TBD
Oral Argument on Motions in Limine	TBD	TBD
Deposition Designations (due for exchange between parties)	TBD	TBD
Objections to Deposition Designations and Counter-Designations (due for exchange between parties)	TBD	TBD
Reply designations and objections to counter-designations of deposition testimony		TBD
Deadline for Submitting Deposition Designations Matrices and Highlighted Transcripts to the Court	TBD	Minimum of two weeks before witness will be called at trial.

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Parties to submit Voir dire Questions, Proposed Preliminary Jury Instructions	September 11, 2023	September 11, 2023
Parties to submit Joint Final Pretrial Order	September 15, 2023	September 15, 2023
Final Pretrial Conference, hearing on motions in limine	September 25, 2023 10:30am	September 25, 2023 10:30am
Hearing Regarding Misc. Pretrial Matters (if needed)	October 2, 2023 10:30am	October 2, 2023 10:30am
First Day of Trial/Voir Dire	October 3, 2023	October 3, 2023

Respectfully submitted,

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*Executive Committee for Class Plaintiffs*

Dated: November 23, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on November 23, 2022, I electronically filed the foregoing Stipulation with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

/s/ Alaina N. Devine  
Alaina N. Devine